

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

GENESIS CARE PTY LIMITED, *et al.*,¹

Reorganized Debtors.

)
)
)
)
)
)
)

Chapter 11

Case No. 23-90614 (MI)

(Jointly Administered)

**CERTIFICATE OF COUNSEL REGARDING THE REORGANIZED GC U.S.
DEBTORS' SECOND OMNIBUS OBJECTION TO CERTAIN SAME-DEBTOR
DUPLICATE CLASS 5B GENERAL UNSECURED CLAIMS**

1. On February 17, 2025, the reorganized Genesis Care U.S. debtors (collectively, the “**Reorganized GC U.S. Debtors**”), filed the *Reorganized GC U.S. Debtors’ Second Omnibus Objection to Certain Same-Debtor Duplicate Class 5B General Unsecured Claims* [Docket No. 2010] (the “**Second Omnibus Objection**”), with a proposed order granting the relief requested in the Second Omnibus Objection attached thereto as Exhibit B (the “**Initial Proposed Order**”).

2. On February 17 and 18, 2025, Kroll Restructuring Administration LLC (“**Kroll**”), the claims, noticing and solicitation agent for the Reorganized GC U.S. Debtors, served the Second Omnibus Objection and related documents by the methods set forth on the Affected Claimants Service List attached as Exhibit E to the *Affidavit of Service* filed by Kroll on March 10, 2025 [Docket No. 2034].

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Claims and Noticing Agent at <https://restructuring.ra.kroll.com/GenesisCare>. The location of the Reorganized GC U.S. Debtors’ principal place of business and service address in these chapter 11 cases is: 1419 SE 8th Terrace, Suite 200, Cape Coral, Florida 33990.

3. Objections or responses to the Second Omnibus Objection were required to be filed and served on or prior to March 20, 2025 (the “**Objection Deadline**”).

4. On March 5, 2025, counsel to claimant Simi Valley Hospital and Health Care Services (“**SVHHC**”) contacted ASK LLP, counsel to the Reorganized GC U.S. Debtors, and informally requested that the Initial Proposed Order be revised to reflect certain clarifications.

5. The Reorganized GC U.S. Debtors agreed to the requested clarifications to the Initial Proposed Order.

6. No other claimant has responded to the Second Omnibus Objection.

7. Attached hereto as **Exhibit A** is a revised proposed order (the “**Revised Proposed Order**”) reflecting the clarifications requested by SVHHC.

8. A redline identifying the clarifications to the Revised Proposed Order, as compared to the Initial Proposed Order, is attached hereto as **Exhibit B**.

9. In accordance with paragraph 45 of the Procedures for Complex Cases in the Southern District of Texas, all known objections or responses to the Second Omnibus Objection have been addressed by the Revised Proposed Order.

[REMAINDER OF PAGE LEFT INTENTIONALLY BLANK]

10. Therefore, the Reorganized GC U.S. Debtors respectfully request entry of the Revised Proposed Order attached hereto as **Exhibit A.**

Dated: March 24, 2025

Respectfully submitted,

/s/ Jason C. DiBattista

ASK LLP

Jason C. DiBattista (admitted *pro hac vice*)

Brigette G. McGrath

2600 Eagan Woods Drive, Suite 400

St. Paul, Minnesota 55121

Telephone: (651) 406-9665

Facsimile: (651) 406-9676

Email: jdibattista@askllp.com

bmcgrath@askllp.com

-and-

Marianna Udem

60 East 42nd Street, 46th Floor

New York, New York 10165

Telephone: (212) 267-7342

Facsimile: (212) 918-3427

E-mail: mudem@askllp.com

*Counsel to the Reorganized GC U.S.
Debtors*

Certificate of Service

I certify that on March 24, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Jason C. DiBattista